

FILED

OCT 25 2018

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MISSOURI
EASTERN DIVISION

U.S. DISTRICT COURT
EASTERN DISTRICT OF MO
ST. LOUIS

UNITED STATES OF AMERICA,

Plaintiff,

v.

ADAM J. CURTIS,

Defendant.

No.

4:18CR00883 RLW/SPM

INDICTMENT

COUNT I
(RECEIPT OF CHILD PORNOGRAPHY)

The Grand Jury charges that:

At all times pertinent to the charges in this indictment:

1. Federal law defined the term

(a) "minor" to mean any person under the age of eighteen years (18 U.S.C. § 2256(1));

(b) "sexually explicit conduct" to mean actual or simulated--

(i) "sexual intercourse, including genital-genital, anal-genital, oral-genital, oral-anal, whether between persons of the same or opposite sex,

(ii) bestiality,

(iii) masturbation,

(iv) sadistic or masochistic abuse, or

(v) lascivious exhibition of the genitals or pubic area of any person (18 U.S.C. § 2256(2)(A));

(c) "computer" to mean an electronic, magnetic, optical, electrochemical or other high

speed data processing device performing logical, arithmetic or storage functions, including any data storage facility or communications facility directly related to or operating in conjunction with such device. (18 U.S.C. § 2256(6));

(d) "child pornography" to mean any visual depiction, including any photograph, film, video, picture, or computer or computer-generated image or picture, whether made or produced by electronic, mechanical, or other means, of sexually explicit conduct, where--

(A) the production of such visual depiction involves the use of a minor engaging in sexually explicit conduct; or

(C) such visual depiction has been created, adapted, or modified to appear that an identifiable minor is engaging in sexually explicit conduct. (18 U.S.C. § 2256(8)).

2. The "internet" was, and is, a computer communications network using interstate and foreign telephone lines to transmit data streams, including data streams used to store, transfer and receive graphic files.

3. Between on or about January 1, 2016 and October 17, 2016, within the Eastern District of Missouri and elsewhere,

ADAM J. CURTIS,

the defendant herein, knowingly received images and videos of child pornography using any means and facilities of interstate and foreign commerce by any means, that is, graphic image and video files that had been received via the Internet which contained child pornography, including but not limited to, the following:

- (a) “(2) soy.wmv” – more fully described as a graphic video file of a prepubescent, minor female performing oral sex on an adult male;
 - (b) “5yo - 13yo Fuck (4).mov” – more fully described as a graphic video file of a prepubescent, minor female performing oral sex on and engaged in vaginal sex with an adult male;
 - (c) “2014-11-14_16-31-34_508..mp4” – more fully described as a graphic video file of a prepubescent, minor female engaged in vaginal sexual intercourse with an adult male;
- In violation of Title 18, United States Code, Section 2252A(a)(2).

COUNT II
(POSSESSION OF CHILD PORNOGRAPHY)

The Grand Jury further charges that:

1. The allegations contained in paragraphs one and two of Count I of this Indictment are incorporated by reference as if fully set forth herein.
2. Between on or about January 1, 2012, and October 17, 2016, within the Eastern District of Missouri and elsewhere,

ADAM J. CURTIS,

the defendant herein, did knowingly possess material that contains an image and video of child pornography that was produced using materials that traveled in interstate and foreign commerce, to wit, a CD (ItemAJ8, CD7) that was produced outside of Missouri and therefore had traveled in interstate and foreign commerce, and said CD contained child pornography, including but not limited to the following:

- (a) “5v.jpg” – more fully described as a graphic image file of a female toddler engaged in anal intercourse with an adult male;

- (b) "08.jpg" – more fully described as a graphic image file of a prepubescent, minor female performing oral sex on an adult male and engaged in sexual intercourse with an adult male;

In violation of Title 18, United States Code, Section 2252A(a)(5)(B).

COUNT III
(POSSESSION OF CHILD PORNOGRAPHY)

The Grand Jury further charges that:

1. The allegations contained in paragraphs one and two of Count I of this Indictment are incorporated by reference as if fully set forth herein.
2. Between on or about January 1, 2014, and October 17, 2016, within the Eastern District of Missouri and elsewhere,

ADAM J. CURTIS,

the defendant herein, did knowingly possess material that contains an image and video of child pornography that was produced using materials that traveled in interstate and foreign commerce, to wit, CD (ItemAJ8, CD8) that was produced outside of Missouri and therefore had traveled in interstate and foreign commerce, and said CD contained child pornography, including but not limited to the following:

- (a) "07.jpg" – more fully described as a graphic image file of a prepubescent, toddler female engaged in sexual intercourse with an adult male;
- (b) "08.jpg" – more fully described as a graphic image file of a prepubescent, minor female performing oral sex on an adult male;

In violation of Title 18, United States Code, Section 2252A(a)(5)(B).

A TRUE BILL.

FOREPERSON

JEFFREY B. JENSEN
United States Attorney

KENNETH R. TIHEN, #37325MO
Assistant United States Attorney